



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 21 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-2234
Project # S-1090862

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Occidental of Elk Hills is proposing a Title V minor permit modification to incorporate the recently issued S-2234-178-0, '-178-1, '-179-0, & '-179-1 into the Title V operating permit. Occidental of Elk Hills, Inc. received Authority to Construct permits (ATCs) for the installation of one 7 MMBtu/hr and one 19 MMBtu/hr gas-fired process heaters for their 35R gas plant. The 19 MMBtu/hr heater (S-2234-178-0) and one of the 7 MMBtu/hr heaters (S-2234-179-0) have been implemented and source tested. However, the process to be served by these heaters is not in operation and OEHI submitted applications and received ATCs to designate the two heaters dormant emissions units (S-2234-178-1, '-179-1). Permits to Operate for the existing units are being issued, reflecting their status as dormant emissions units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2234-178-0, '-178-1, '-179-0, & '-179-1, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 21 2012

Dennis Champion
Occidental of Elk Hills
10800 Stockdale Hwy
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification
District Facility # S-2234
Project # S-1090862**

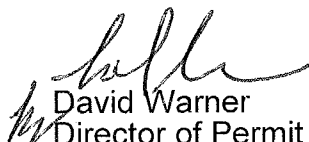
Dear Mr. Champion:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-2234-178-0, '-178-1, '-179-0, & '-179-1 into the Title V operating permit. Occidental of Elk Hills, Inc. received Authority to Construct permits (ATCs) for the installation of one 7 MMBtu/hr and one 19 MMBtu/hr gas-fired process heaters for their 35R gas plant. The 19 MMBtu/hr heater (S-2234-178-0) and one of the 7 MMBtu/hr heaters (S-2234-179-0) have been implemented and source tested. However, the process to be served by these heaters is not in operation and OEHI submitted applications and received ATCs to designate the two heaters dormant emissions units (S-2234-178-1, '-179-1). Permits to Operate for the existing units are being issued, reflecting their status as dormant emissions units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2234-178-0, '-178-1, '-179-0, & '-179-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification

Project #: S-1090862

Engineer: Stephen Leonard

Date: August 15, 2012

Lead Engineer: Richard Karrs

Date: *RWK 8-20-12*

Facility Number: S-2234
Facility Name: Occidental of Elk Hills, Inc.
Mailing Address: 10800 Stockdale Highway
Bakersfield, CA 93311

Contact Name: Dennis Champion
Phone: (661) 412-5214

Responsible Official: Armando Gonzales
Title: Manager, Health, Environment, Safety and Security

I. PROPOSAL

Occidental of Elk Hills, Inc. (OEHI) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATCs) S-2234-178-0, '-179-0 (Project S1063316), and '-178-1, '-179-1 (project S1083201) into the Title V Operating Permit.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The facility is located at Occidental of Elk Hills, Inc's Natural Gas Production Source S-2234 in Kern County.

III. ATC EQUIPMENT DESCRIPTION

ATC #S-2234-178-0: 19 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-207 (REVISED TO ADD 4320 ANNUAL EMISSION FEE CONDITIONS 3/4/2010)

ATC #S-2234-178-1: MODIFICATION OF 19 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-207: DESIGNATE AS DORMANT EMISSIONS UNIT FOR RULE 4306 (ATC REVISED TO ADD 4320 ANNUAL EMISSION FEE CONDITIONS 3/4/2010)

ATC #S-2234-179-0: 7 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-213 (REVISED TO ADD 4320 ANNUAL EMISSION FEE CONDITIONS 3/4/2010)

ATC #S-2234-179-1: MODIFICATION OF 7 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-213: DESIGNATE AS DORMANT EMISSIONS UNIT FOR RULE 4306 (REVISED TO ADD 4320 ANNUAL EMISSION FEE CONDITIONS 3/4/2010)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Occidental of Elk Hills, Inc. (OEHI) received Authority to Construct (ATC) permits for the installation of two 7 MMBtu/hr and one 19 MMBtu/hr Mohawk Process Equipment 7,000 series natural gas-fired heaters. These heaters are proposed for OEHI's 35R gas plant to serve the dehydration and CO₂ removal systems proposed in District project S-1062951. The dehydration and CO₂ removal systems are to pre-treat the gas before it is sent to the nitrogen rejection unit proposed in District project S-1062249.

The 19 MMBtu/hr heater (S-2234-178-0) and one of the 7 MMBtu/hr heaters (S-2234-179-0) have been implemented and source tested. However, the CO₂ removal system is not in operation and OEHI submitted applications to designate the two heaters dormant emissions

units (S-2234-178-1, '-179-1). Permits for the existing units are being issued, reflecting their status as dormant units.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

Occidental of Elk Hills, Inc.

Facility # S-2234

Project # S-1090862

VIII. ATTACHMENTS

- A. Proposed Title V Permit Unit Requirements S-2234-178-3 & '-179-3
- B. Authority to Construct Documents S-2234-178-0, '-178-1, '-179-0, & '-179-1
- C. Emissions Increases
- D. Applications
- E. Title V - Compliance Certification Form

Occidental of Elk Hills, Inc.
Facility # S-2234
Project # S-1090862

ATTACHMENT A

**Proposed Title V Permit Unit Requirements
S-2234-178-3 & '-179-3**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-178-3

EXPIRATION DATE: 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

19 MMBTU/HR MOHAWK PROCESS EQUIPMENT NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER WITH ZEECO MODEL GLSF BURNER, #F-207

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. This unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
11. If the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. If the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, 4305, and 4306] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
25. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit
27. On and after July 1, 2012, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-179-3

EXPIRATION DATE: 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

7 MMBTU/HR MOHAWK PROCESS EQUIPMENT NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER WITH ZEECO MODEL GLSF BURNER, #F-213

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. This unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
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17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305, and 4306] Federally Enforceable Through Title V Permit
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20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
25. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
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27. On and after July 1, 2012, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Occidental of Elk Hills, Inc.
Facility # S-2234
Project # S-1090862

ATTACHMENT B

**Authority to Construct Documents
S-2234-178-0, '-178-1, '-179-0, & '-179-1**



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-178-0

ISSUANCE DATE: 01/25/2007

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: ATTN: GEORGE GOUGH, ENVIRONMENTAL TEAM LEADER
P. O. BOX 1001
TUPMAN, CA 93276-1001

LOCATION: GAS PLANT
SECTION NE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
19 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-207

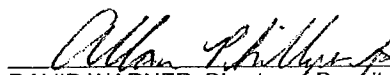
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
5. This unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
7. If the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 326-6900 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

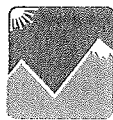

DAVID WARNER, Director of Permit Services
S-2234-178-0 Jan 25 2007 2:12PM -- ELLENBEC Joint Inspection NOT Required

Southern Regional Office • 2700 M Street, Suite 275 • Bakersfield, CA 93301-2370 • (661) 326-6900 • Fax (661) 326-6985

8. If the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
10. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rules 1081, 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
18. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]

CONDITIONS CONTINUE ON NEXT PAGE

19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
22. Prior to operating equipment under this Authority to Construct, permittee shall surrender NO_x emission reduction credits for the following quantity of emissions: 1st quarter - 1,793 lb, 2nd quarter - 1,793 lb, 3rd quarter - 1,793 lb, and fourth quarter - 1,792 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
23. Prior to operating equipment under this Authority to Construct, permittee shall surrender SO_x emission reduction credits for the following quantity of emissions: 1st quarter - 119 lb, 2nd quarter - 119 lb, 3rd quarter - 118 lb, and fourth quarter - 118 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
24. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter - 3,496 lb, 2nd quarter - 3,495 lb, 3rd quarter - 3,495 lb, and fourth quarter - 3,495 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
25. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 791 lb, 2nd quarter - 791 lb, 3rd quarter - 790 lb, and fourth quarter - 790 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
26. ERC Certificate Numbers S-2160-2, S-2163-5, S-826-3 and S-2156-1 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-178-1

ISSUANCE DATE: 10/27/2008

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.

MAILING ADDRESS: P O BOX 1001
TUPMAN, CA 93276-1001

LOCATION: GAS PLANT
SECTION NE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 19 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-207: DESIGNATE AS DORMANT EMISSIONS UNIT FOR RULE 4306

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in conditions below. [District Rule 2010]
3. The fuel supply line shall be physically disconnected from this unit. [District Rules 2201 & 4306]
4. A source test to demonstrate compliance with NOx and CO emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rules 2201 & 4306]
5. Operators shall notify the District at least seven (7) calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rules 2201 & 4306]
6. Upon recommencing operation, no air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. Upon recommencing operation, particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 326-6900 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-2234-178-1 : Oct 27 2008 12:48PM -- ADAMS : Joint Inspection NOT Required

8. Upon recommencing operation, emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
9. Upon recommencing operation, this unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Upon recommencing operation, copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Upon recommencing operation, if the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Upon recommencing operation, if the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Upon recommencing operation, source testing to measure natural gas combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
14. Upon recommencing operation, the results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Upon recommencing operation, the source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
17. Upon recommencing operation, source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Upon recommencing operation, the following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
19. Upon recommencing operation, for emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Upon recommencing operation, the permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
21. Upon recommencing operation, if either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]
22. Upon recommencing operation, all alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
23. Upon recommencing operation, the permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
24. Upon recommencing operation, all records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1 and 4306, 6.1]
Federally Enforceable Through Title V Permit
25. Prior to operating equipment under this Authority to Construct, permittee shall surrender NO_x emission reduction credits for the following quantity of emissions: 1st quarter - 1,793 lb, 2nd quarter - 1,793 lb, 3rd quarter - 1,793 lb, and fourth quarter - 1,792 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
26. Prior to operating equipment under this Authority to Construct, permittee shall surrender SO_x emission reduction credits for the following quantity of emissions: 1st quarter - 119 lb, 2nd quarter - 119 lb, 3rd quarter - 118 lb, and fourth quarter - 118 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
27. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter - 3,496 lb, 2nd quarter - 3,495 lb, 3rd quarter - 3,495 lb, and fourth quarter - 3,495 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 791 lb, 2nd quarter - 791 lb, 3rd quarter - 790 lb, and fourth quarter - 790 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
29. ERC Certificate Numbers S-2160-2, S-2163-5, S-826-3 and S-2156-1 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-179-0

ISSUANCE DATE: 01/25/2007

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: ATTN: GEORGE GOUGH, ENVIRONMENTAL TEAM LEADER
P. O. BOX 1001
TUPMAN, CA 93276-1001

LOCATION: GAS PLANT
SECTION NE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
7 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-213

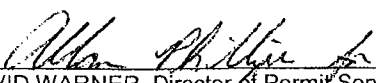
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
5. This unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
7. If the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
S: 2234-179-0 Jan 25 2007 2:12PM -- ELLENBEC Joint Inspection NOT Required

Southern Regional Office • 2700 M Street, Suite 275 • Bakersfield, CA 93301-2370 • (661) 326-6900 • Fax (661) 326-6985

8. If the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
10. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
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17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
18. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]

CONDITIONS CONTINUE ON NEXT PAGE

19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
22. Prior to operating equipment under this Authority to Construct, permittee shall surrender NO_x emission reduction credits for the following quantity of emissions: 1st quarter - 661 lb, 2nd quarter - 661 lb, 3rd quarter - 660 lb, and fourth quarter - 660 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
23. Prior to operating equipment under this Authority to Construct, permittee shall surrender SO_x emission reduction credits for the following quantity of emissions: 1st quarter - 44 lb, 2nd quarter - 44 lb, 3rd quarter - 44 lb, and fourth quarter - 43 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
24. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter - 1,288 lb, 2nd quarter - 1,288 lb, 3rd quarter - 1,288 lb, and fourth quarter - 1,287 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
25. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 292 lb, 2nd quarter - 291 lb, 3rd quarter - 291 lb, and fourth quarter - 291 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
26. ERC Certificate Numbers S-2160-2, S-2163-5, S-826-3 and S-2156-1 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-179-1

ISSUANCE DATE: 10/27/2008

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.

MAILING ADDRESS: P O BOX 1001
TUPMAN, CA 93276-1001

LOCATION: GAS PLANT
SECTION NE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 7 MMBTU/HR NATURAL GAS-FIRED MOL-SIEVE PROCESS HEATER, #F-213: DESIGNATE AS DORMANT EMISSIONS UNIT FOR RULE 4306


CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in conditions below. [District Rule 2010]
3. The fuel supply line shall be physically disconnected from this unit. [District Rules 2201 & 4306]
4. A source test to demonstrate compliance with NOx and CO emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rules 2201 & 4306]
5. Operators shall notify the District at least seven (7) calendar days prior to recommencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rules 2201 & 4306]
6. Upon recommencing operation, no air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. Upon recommencing operation, particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 326-6900 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
S-2234-179-1 : Oct 27 2008 12:48PM -- ADAMSM : Joist Inspection NOT Required

8. Upon recommencing operation, emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.015 lb/MMBtu or 12 ppmv @ 3% O₂; VOC - 0.019 lb/MMBtu; CO - 0.084 lb/MMBtu or 114 ppmv @ 3% O₂; PM₁₀ - 0.013 lb/MMBtu. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
9. Upon recommencing operation, this unit shall only be fired on natural gas with a sulfur content which does not exceed 1.0 grains/ 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Upon recommencing operation, copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Upon recommencing operation, if the heater is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the heater shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Upon recommencing operation, if the heater is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Upon recommencing operation, source testing to measure natural gas combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
14. Upon recommencing operation, the results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Upon recommencing operation, the source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
16. Upon recommencing operation, all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
17. Upon recommencing operation, source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Upon recommencing operation, the following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit
19. Upon recommencing operation, for emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Upon recommencing operation, the permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
21. Upon recommencing operation, if either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306]
22. Upon recommencing operation, all alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306]
23. Upon recommencing operation, the permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
24. Upon recommencing operation, all records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1 and 4306, 6.1]
Federally Enforceable Through Title V Permit
25. Prior to operating equipment under this Authority to Construct, permittee shall surrender NO_x emission reduction credits for the following quantity of emissions: 1st quarter - 661 lb, 2nd quarter - 661 lb, 3rd quarter - 660 lb, and fourth quarter - 660 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
26. Prior to operating equipment under this Authority to Construct, permittee shall surrender SO_x emission reduction credits for the following quantity of emissions: 1st quarter - 44 lb, 2nd quarter - 44 lb, 3rd quarter - 44 lb, and fourth quarter - 43 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
27. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter - 1,288 lb, 2nd quarter - 1,288 lb, 3rd quarter - 1,288 lb, and fourth quarter - 1,287 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 292 lb, 2nd quarter - 291 lb, 3rd quarter - 291 lb, and fourth quarter - 291 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit
29. ERC Certificate Numbers S-2160-2, S-2163-5, S-826-3 and S-2156-1 (or certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

Occidental of Elk Hills, Inc.
Facility # S-2234
Project # S-1090862

ATTACHMENT C

Emissions Increases

Occidental of Elk Hills, Inc.

Facility # S-2234

Project # S-1090862

Proposed PTO: S-2234-178-3

	SSIPE (lb/yr)				
	NOx	SO _x	PM10	CO	VOC
S-2234-178-3	2497	474	2164	13981	3162

Proposed PTO: S-2234-178-3

	SSIPE (lb/yr)				
	NOx	SO _x	PM10	CO	VOC
S-2234-179-3	920	175	797	5151	1165

Occidental of Elk Hills, Inc.
Facility # S-2234
Project # S-1090862

ATTACHMENT D

Applications

S-2234-178-0, 179-0

San Joaquin Valley Air Pollution Control District

www.valleyair.org

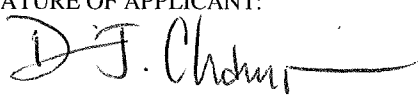
Received

FEB 19 2009

Permits Srvc
SJVAPCD

Permit Application For:

☒ ADMINISTRATIVE AMENDMENT ☐ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Occidental of Elk Hills, Inc		
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 1001 CITY: Tupman STATE: CA 9-DIGIT ZIP CODE: 93276-1001		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Elk Hills Natural Gas Processing Stationary Source CITY: _____ _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____		INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Production and sale of crude oil and associated natural gas products.		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) APCD PN 1063316 authorized the installation of 3 heaters. This application will implement S-2234-177-0, S-2234-178-0 and S-2234-179-0 into the existing Title V permitting document for the Elk Hills Natural Gas Processing Stationary Source at Elk Hills.		
6. TYPE OR PRINT NAME OF APPLICANT: Dennis J. Champion, PE		TITLE OF APPLICANT: Environmental Engineer
7. SIGNATURE OF APPLICANT: 	DATE: February 6, 2009	PHONE: (661) 763-6068 FAX: (661) 763-6161 EMAIL: dennis_champion@oxy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____	CHECK#: _____
	DATE PAID: _____	
	PROJECT NO: S-1090862	
	FACILITY ID: S-2234	



OCCIDENTAL OF ELK HILLS, INC.
28590 Highway 119, P.O. Box 1001, Tupman, CA 93276-1001
Telephone 661 763-6000

February 6, 2009

Received

FEB 19 2009

Permits Srvc
SJVAPCD

Mr. Martin Keast
Manager Title V Permitting
San Joaquin Valley APCD
Central Regional Office
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Subject: Administrative Amendment to Title-V Permit for Facility S-2234

Occidental of Elk Hills, Inc. (OEHI) requests District approval of an administrative amendment to the Title-V Permit for the Natural Gas Processing Stationary Source, Facility ID S-2234. The revision is required to incorporate Authorities to Construct S-2234-177-0, S-2234-178-0 and S-2234-179-0 into the Title-V Permit.

An application for a Title-V Modification and a Title-V Compliance Certification form is attached for your review and approval. Please invoice OEHI for the permit fees and associated engineering costs incurred to process this permit amendment.

If you have any questions or require additional information, please contact me directly at (661) 763-6068.

Sincerely,

A handwritten signature in black ink, appearing to read "D.J. Champion", with a horizontal line extending to the right.

Dennis J. Champion, PE
Environmental Engineer

DJC:

Attachments

cc: Mike Glavin, OEHI

S-2234-178-1, 179-1


San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received
JAN 05 2009
SJVUAPCD

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Occidental of Elk Hills, Inc.	
2. MAILING ADDRESS: STREET/P.O. BOX: 29590 Highway 119, PO Box 1001 CITY: Tupman STATE: CA 9-DIGIT ZIP CODE: 93276-1001	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Elk Hills Oil and Gas Fields CITY: Tupman ¼ SECTION NE-35 TOWNSHIP 30S RANGE 23E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and gas production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Include ATCs, as listed below (copies attached) in Title-V Permit for Occidental of Elk Hills, Inc.: S-2234-177-1 . S-2234-177-0 S-2234-178-1 S-2234-179-1	
6. TYPE OR PRINT NAME OF APPLICANT: Nicky A. Langley	TITLE OF APPLICANT: Environmental Engineer
7. SIGNATURE OF APPLICANT: 	DATE: 12/30/2008 PHONE: (661) 763-6525 FAX: (661) 763-6161 EMAIL: nicky_langley@oxy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ 0	CHECK#: _____
	DATE PAID: _____	
	PROJECT NO: S-1090014	FACILITY ID: S-2234



OCCIDENTAL OF ELK HILLS, INC.
28590 Highway 119, P.O. Box 1001, Tupman, CA 93276-1001
Telephone 661 763-6000

December 30, 2008

Received
JAN 05 2009
SJVUAPCD

Mr. Martin Keast
San Joaquin Valley APCD
Central Regional office
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Re: Minor Amendment to Title-V Permit Facility IS S-2234

Dear Mr. Keast

Occidental of Elk Hills, Inc. (OEHI) requests District approval for a Minor Amendment to include three (3) Authority to Construct numbers S-2234-177-1, '-178-1 and '-179-1 in the Facility S-2234 Title-V Permit.

A permit Application for Title-V Minor Modification and the Title-V Modification Compliance Certification Forms are attached for processing. Please invoice OEHI for the permit fee and costs incurred in processing the permit amendments.

If you have any questions or require additional information, please contact me directly at (661) 763-6525.

Yours sincerely,

Nicky A. Langley
Environmental Engineer *for*
Occidental of Elk Hills, Inc.

NAL/attachments

Occidental of Elk Hills, Inc.

Facility # S-2234

Project # S-1090862

ATTACHMENT E

Title V - Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION


☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Occidental of Elk Hills, Inc.	FACILITY ID: S - 2234
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Occidental of Elk Hills, Inc.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

12/30/08
Date

Armando Gonzalez

Name of Responsible Official (please print)

Health, Environment, Safety & Security Manager

Title of Responsible Official (please print)